



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

400 Seventh St., S.W.  
Washington, D.C. 20590

**JUN 21 2001**

DOT-E 11316  
(FIFTH REVISION)

EXPIRATION DATE: May 31, 2003

(FOR RENEWAL, SEE 49 CFR § 107.109)

1. GRANTEE: TRW Automotive  
(Former Grantee: Vehicle Safety Systems)  
Queen Creek, AZ
2. PURPOSE AND LIMITATION:
  - a. This exemption authorizes the transportation in commerce of certain cartridges, power device classed as Division 1.4S, and airbag inflators or airbag modules classed as Division 4.1 or Class 9 in prescribed packaging, which are exempt from marking and labeling requirements, subject to the special provisions herein. This exemption provides no relief from any regulation other than as specifically stated herein.
  - b. The safety analyses performed in development of this exemption only considered the hazards and risks associated with transportation in commerce.
3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.
4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR Part 172, Subparts D and E; § 173.62(c), insofar as Packing Method E-114 for UN0323 cartridges, power device; § 173.166(c), (e) and (f) insofar as Division 4.1 airbag inflators or airbag modules are not subject to packaging, marking and labeling requirements except as specified herein.
5. BASIS. This exemption is based on TRW Automotive's application dated May 23, 2001, submitted in accordance with § 107.109.

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6. HAZARDOUS MATERIALS (49 CFR § 172.101):

Hazardous materials description/proper shipping name	Hazard Class/Division	Identification Number	Pack-ing Group
Cartridges, power device (airbag inflators)	1.4S	UN0323	II
Airbag inflators or airbag modules	4.1	NA1325	III
Airbag inflators or airbag modules	9	UN3268	III

7. SAFETY CONTROL MEASURES:

a. PACKAGING - Inner packaging is not necessary. Outer packaging must be as follows:

(i) reusable, high-strength molded, stackable plastic trays designed to prevent movement of each device in any direction;

(ii) no more than 16 power device cartridges or airbag inflators or airbag modules must be packaged per tray;

(iii) no more than 15 trays must be stacked on a rugged pallet of the same approximate dimensions. A reusable rigid molded plastic cover piece must be placed over the top tray and tightly secured to each pallet by a textile strap.

b. SAFETY CONTROL MEASURES-

(i) Palletized units may not be double or triple stacked in the cargo area and must be securely blocked and braced to prevent movement during shipment.

(ii) No hazardous materials other than those listed in paragraph 6 of this exemption may accompany the shipment.

(iii) The vehicle cargo areas must be enclosed, have hardwood floors and be completely lined with plywood of at least 0.95 cm (3/8 inches) thickness or more.

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8. SPECIAL PROVISIONS: This exemption applies only to shipments between the applicant's manufacturing facilities in Queen Creek, AZ and Mesa, AZ, a distance of approximately 22 miles and TRW shipping and warehouse points in-between the two sites.
9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle.
10. MODAL REQUIREMENTS:
- a. A current copy of this exemption must be carried aboard each motor vehicle used to transport packages covered by this exemption.
  - b. Only company-owned or leased vehicles operated by trained employees or contract drivers may be used.
11. COMPLIANCE: Failure by a person to comply with any of the following may result in suspension or revocation of this exemption and penalties prescribed by Federal hazardous materials transportation law, 49 U.S.C. 5101 et seq.:
- o All terms and conditions prescribed in this exemption and the Hazardous Materials Regulations, 49 CFR Parts 171-180.
  - o Registration required by § 107.601 et seq., when applicable.

Each "Hazmat employee", as defined in § 171.8, who performs a function subject to this exemption must receive training on the requirements and conditions of this exemption in addition to the training required by §§ 172.700 through 172.704.

No person may use or apply this exemption, including display of its number, when the exemption has expired or is otherwise no longer in effect.

12. REPORTING REQUIREMENTS. The carrier is required to report any incident involving fire, explosion or loss of packaging contents or packaging failure to the Associate Administrator for Hazardous Materials Safety (AAHMS) as soon as practicable. (Sections 171.15 and 171.16 apply to any activity undertaken under the authority of this exemption.) In addition, the holder(s) of this exemption must inform the AAHMS, in writing, of any incidents involving the package and shipments made under the terms of this exemption.

Issued in Washington, D.C.:

*R. McGuire*

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Robert A. McGuire  
Associate Administrator  
for Hazardous Materials Safety

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(DATE)

Address all inquiries to: Associate Administrator for Hazardous Materials Safety, Research and Special Programs Administration, Department of Transportation, Washington, D.C. 20590.  
Attention: DHM-31.

The original of this exemption is on file at the above office. Photo reproductions and legible reductions of this exemption are permitted. Any alteration of this exemption is prohibited.

Copies of exemptions may be obtained from the AAHMS, U.S. Department of Transportation, 400 7th Street, SW, Washington, DC 20590-0001, Attention: Records Center, 202-36-5046.

PO: AM